

UNITED STATES DISTRICT COURTS
EASTERN DISTRICT OF TEXAS
DIVISION

Caitlin Weathers

Case Number: 4:22cv4085

Name of Plaintiff(s)

vs

Houston Methodist
Hospital

Name of Defendant(s)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

Note: If plaintiff is alleging employment discrimination based on race or color, please also see 42:U.S.C. 1981

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the court by 42 U.S.C. 2000e-5. Equitable and other relief are also sought under 42 U.S.C. 2000e-5(g).

2.. Plaintiff, Caitlin Weathers, is a citizen of the United States
(name of plaintiff)

and resides at 2425 Capital St #2143, Houston,
(street address) (city)

Harris, TX, 77003, 832 314 6857.
(county) (state) (zip) (telephone)

- 3.. Defendant, Houston Methodist Hosp, resides at, or its business is
(name of defendant)
located at 241505 Fannin, Houston,
(street address) (city)
Harris, Tx, 77030, _____
(county) (state) (zip) (telephone)
4. Plaintiff sought employment from the defendant or was employed by the defendant
at 6551 Bertner Ave, Houston,
(street address) (city)
Harris, Tx, 77030,
(county) (state) (zip)
5. Defendant discriminated against plaintiff in the manner indicated in paragraphs 9 and 10
of the complaint on or about _____
(month, day, year)
6. Plaintiff filed charges against the defendant with the Equal Employment Opportunity
Commission charging defendant with the acts of discrimination indicated in paragraphs
9 and 10 of this complaint on or about _____
(month, day, year)
7. The Equal Employment Commission issued a Notice of Right to Sue which was
received by plaintiff on _____
(month day, year)

8. Because of plaintiff's (1) ☒ race, (2) ☒ color, (3) ☒ sex,
(4) _____ national origin, defendant:

a. _____ failed to employ plaintiff.

b. ☒ terminated plaintiff's employment.

c. _____ failed to promote plaintiff.

d. ☒ Other retaliation

9. The circumstances under which the defendant discriminated against plaintiff were as follows:

Race - Only Caucasian in job role
of team ≥ 10 employees. Called
"white trash".

Sex - Sunila Ali + Kim Randle tried
to set me up with male ~~employee~~.
Called gay on my last day
on the unit.

Retaliation - during my first
meeting to talk about my reports
of discrimination I was told
by Sunila Ali that she was
going to initiate the "PIP"
process which precedes termination

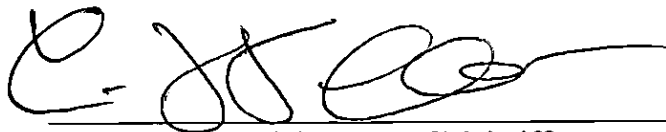
10. The acts set forth in paragraph 9 of this complaint:

- a. _____ are still being committed by defendant.
- b. _____ are no longer being committed by defendant.
- c. ☒ defendant may still be committing the acts.

11. Plaintiff attaches to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission which charges are submitted as a brief statement of the facts supporting this complaint. WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- a. _____ Defendant be directed to employ plaintiff.
- b. ☒ Defendant be directed to re-employ plaintiff.
- c. _____ Defendant be directed to promote plaintiff.
- d. _____ Defendant be directed to _____ and that the

Court grant such relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.



(Signature of Plaintiff)

General Complaint

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS

Caitlin Weathers

Case Number : _____

List the full name of each plaintiff in this action.

VS.

Houston Methodist
Hospital

List the full name of each defendant in this action.
Do not use "et al".

Attach additional pages if necessary.

I. ATTEMPT TO SECURE COUNSEL:

Please answer the following concerning your attempt to secure counsel.

A. In the preparation of this suit, I have attempted to secure the aid of an attorney as follows: (circle one)

- ① Employ Counsel
2. Court - Appointed Counsel - Requesting ② 11/12 *11/9/22
- ③ Lawyer Referral Service of the State Bar of Texas,
P. O. Box 12487, Austin, Texas 78711.

B. List the name(s) and address(es) of the attorney(s):

1. Rob Wiley / Wheeler 1651 Richmond
Houston, TX 77006

3. Lone Star Legal Aid

C. Results of the conference with counsel:

denial / unable to
represent

II. List previous lawsuits:

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action or any other incidents? _____ Yes ☒ No

B. If your answer to "A" is "yes", describe the lawsuit in the space below.
If there is more than one lawsuit, attach a separate piece of paper describing each.

1. Approximate file date of lawsuit: _____

2. Parties to previous lawsuit(s):

Plaintiff _____

Defendant _____

Attach a separate piece of paper for additional plaintiffs or defendants.

3. Identify the court the lawsuit was filed. If federal, name the district. If state, name the county.

4. Docket number in other court. _____

5. Name of judge to whom the case was assigned.

6. Disposition: Was the case dismissed, appealed or still pending?

7. Approximate date of disposition. _____

III. Parties to this suit:

A. List the full name and address of each plaintiff:

Pla #1 ~~Houston Methodist Hospital~~
Caitlin J. Weathers

Pla #2 _____

B. List the full name of each defendant, their official position, place of employment and full mailing address.

Dft #1: ~~Houston Methodist Hosp~~
6805 Fannin St, Houston, TX 77030
No position made
Dft #2: ~~HCA Healthcare~~

Dft #3 Sunila Ali
// //

Attach a separate sheet for additional parties.

IV: Statement of Claim:

State as briefly as possible the fact of your case. Describe how each defendant is involved. Include the names of other persons involved with dates and places. Do not give any legal arguments or cite cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need, attaching additional pages if necessary.

I believe Simla Ali the hiring manager for HMT's Neuro ICU unit retaliated against me after filing reports of harassment / discrimination. I was hired on May 28, 2019 as a transporter at Houston Methodist Hospital and transferred to the new job role the day after Memorial day (2021). I made multiple attempts / complaints which only escalated movements against me.

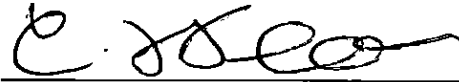
claims:

race - only caucasian in job role for this employer (Sharon Agawye)
 sex - harassed by single male (Cameron ^{Stank})
 retaliation - see above (Simla Ali)

V. Relief: State Briefly exactly what you want the court to do for you. Make no legal arguments and do not cite cases or statutes. Attach additional pages if necessary.

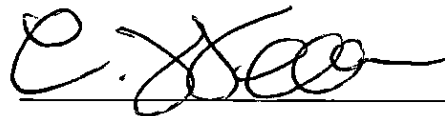
BACK pay, punitive damages,
option to return to work -
re-employed

Signed this Caitlin 9 day of November, 20 22.
Weather (Month) (Year)



I declare (certify, verify or state) under penalty of perjury that the foregoing is true and correct.

Executed on: 11 / 9 / 22
Date



Signature of each plaintiff